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July 31, 2020

VIA ECF AND E-MAIL

The Honorable Stuart M. Bernstein  
United States Bankruptcy Court  
One Bowling Green  
New York, NY 10004-1408

Re: *Picard v. Sage Associates, et al.*, Adv. Pro. No. 10-04362 (SMB)  
*Picard v. Sage Realty, et al.*, Adv. Pro. No. 10-04400 (SMB)

Dear Judge Bernstein:

I write on behalf of defendants Sage Associates, Sage Realty, Malcolm Sage, Martin Sage, and Ann Sage Passer (collectively, the “Sages”) in the above-referenced Adversary Proceedings and with the consent of counsel to Irving H. Picard as trustee (the “Trustee”) concerning the conference scheduled for August 4, 2020 at 10:00 am.

The Sages have found a work around to deal with the problem of being unable to collect certain securities pricing data due to the closing of the New York Public Library. Counsel have conferred and agreed to the following amended pretrial schedule.

Activity	Date
Exchange draft Joint Pre-Trial Order (45 days prior)	September 14, 2020
Exchange Exhibits and Deposition Designations (30 days prior)	September 28, 2020
Exchange Objections to Exhibits and Deposition Designations (21 days prior)	October 7, 2020
File Motions in Limine (14 days prior)	October 14, 2020
File Oppositions to Motions In Limine (7 days prior)	October 21, 2020

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Activity	Date
Proposed Final Joint Pre-Trial Order to Judge Bernstein's Chambers (7 days prior)	October 21, 2020
Proposed Final Pretrial Conference Date	October 28, 2020

Given the parties' agreement, and subject to the Court's approval of the foregoing schedule, the parties respectfully request that the conference scheduled for August 4, 2020 be cancelled.

Respectfully,



Andrew B. Kratenstein

cc: All counsel via ECF